

EXHIBIT C

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*Counsel for Plaintiffs; additional counsel
listed in signature blocks below*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL
CATALDO, JULIAN
SANTIAGO, and SUSAN LYNN
HARVEY, individually and on behalf of all
others similarly situated,

Plaintiffs,
v.

GOOGLE LLC,
Defendant.

COOLEY LLP

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Counsel for Defendant Google LLC

Case No. 3:20-cv-04688-RS

JOINT WITNESS LIST

Judge: Hon. Richard Seeborg
Courtroom: 3, 17th Floor

1 Pursuant to the Court's January 9, 2025 Order (Dkt. 446), the Court's November 30, 2023
2 Standing Order Re: Guidelines for Final Pretrial Conference in Civil Jury Cases, and in advance of
3 the Pretrial Conference set for July 23, 2025, Plaintiffs and Defendant Google LLC jointly submit
4 this witness list identifying (1) all fact witnesses likely to be called at trial other than solely for
5 impeachment or rebuttal and (2) all expert witnesses. These lists are not a commitment that the either
6 of the parties will in fact call any particular witness at trial but rather reflect a good-faith effort by
7 the parties to identify witnesses they presently anticipate they will (or in some limited cases may)
8 call to testify at trial in this matter, as well as the manner in which the witnesses will appear (*i.e.*,
9 live or by deposition).

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I. PLAINTIFFS' WITNESS LIST

Plaintiffs' list of fact witnesses includes current and former Google employees based on the assumption that the parties will be able to reach an agreement regarding the admission of documents produced by Google. Plaintiffs reserve the right to add additional current and former Google employees to this list, including if the parties are unable to reach such an agreement.

Plaintiffs' Fact Witnesses		
Witness Name	Substance of Testimony	Format
Cataldo, Sal	As one of the appointed class representatives, Mr. Cataldo will testify about his experience with the relevant Google controls and Google data collection during the relevant class period.	Live / Will Call
Harvey, Susan Lynn	As one of the appointed class representatives, Ms. Harvey will testify about her experience with the relevant Google controls and Google data collection during the relevant class period.	Live / Will Call
Rodriguez, Anibal	As one of the appointed class representatives, Mr. Rodriguez will testify about his experience with the relevant Google controls and Google data collection during the relevant class period.	Live / Will Call
Santiago, Julian	As one of the appointed class representatives, Mr. Santiago will testify about his experience with the relevant Google controls and Google data collection during the relevant class period.	Live / Will Call
Heft-Luthy, Sam	Mr. Heft-Luthy is a former Google employee based in the Bay Area who was deposed in this case. Plaintiffs intend to call Mr. Heft-Luthy both to present documents and certain admissions regarding Google's conduct during the class period.	Live / Will Call
Kearns, Jason Craig	Mr. Kearns is a current Google employee based in London who was deposed in this case. Plaintiffs may call Mr. Kearns (either by deposition or live) both to present documents and certain admissions regarding Google's conduct during the class period.	Live or by Depo / May Call

1	Lemoine, Blake	Mr. Lemoine is a former Google employee who resides outside the Bay Area who was deposed in the <i>Brown</i> ¹ matter, and whose deposition testimony in that <i>Brown</i> action has been referenced and relied upon in this action, including summary judgment without objection from Google. Plaintiffs may present portions of Mr. Lemoine's deposition testimony at trial, including with respect to his admissions regarding Google's collection and use of data when (s)WAA is turned off.	Depo / May Call
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7	Monsees, David	Mr. Monsees is a current Google employee based in the Bay Area who was deposed in this case. Plaintiffs intend to call Mr. Monsees both to present documents and certain admissions regarding Google's conduct during the class period.	Live / Will Call
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11	Miraglia, Eric	Mr. Miraglia is a former Google employee based in Colorado who was deposed in this case. Plaintiffs may call Mr. Miraglia (by deposition) both to present documents and certain admissions regarding Google's conduct during the class period.	Depo / May Call
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14	Pichai, Sundar	Mr. Sundar is the current CEO of Google who testified before Congress about Google's practices related to user privacy and was involved with the conduct and decisions challenged with this class action lawsuit. If allowed by the Court, Plaintiffs would call Mr. Pichai for the purpose of presenting documents and certain admissions regarding Google's conduct during the class period.	Reserve right to call
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19	Ruemmler, Christopher	Mr. Ruemmler is a current Google employee based in the Bay Area who was deposed in this case. Plaintiffs intend to call Mr. Ruemmler both to present documents and certain admissions regarding Google's conduct during the class period.	Live / Will Call
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22	Google document custodians	If necessary and subject to negotiation with Google, Plaintiffs may call a Google document custodian for purposes of presenting and admitting certain documents produced by Google.	Live / May Call
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¹ *Brown v. Google LLC*, Case No.: 4:20-cv-3664-YGR (N.D. Cal.).

Plaintiffs' Expert Witnesses

Witness Name	Substance of Testimony	Format
Hochman, Jonathan	Jonathan Hochman is a lecturer at Yale, a co-founder of Alchemist Associates, a co-founder of UNS, and founder of Hochman Consultants. He also worked as a teaching fellow at Yale. Mr. Hochman will testify about the matters detailed in his expert reports and discussed during his deposition, including the technical processes by which Google during the class period collected, saved, and used app activity information while class members had (s)WAA turned off.	Live / Will Call
Keegan, Mark	Mark Keegan is a survey expert who has personally conducted over 1,000 consumer surveys reaching more than 250,000 consumers. Mr. Keegan will testify about the matters detailed in his expert reports and discussed during his deposition, including the survey he conducted for this case.	Live / Will Call
Lasinski, Michael	Michael Lasinski is a Certified Public Accountant with many years of experience evaluating the financial aspects of intellectual property for government entities, corporations, and law firms. Mr. Lasinski will testify about the matters detailed in his expert reports and discussed during his deposition, including his models and monetary relief inputs and quantifications.	Live / Will Call
Schneier, Bruce	Professor Bruce Schneier, a lecturer and fellow at the Harvard Kennedy School, is a security technologist who researches, writes, and speaks about computer security and Internet security, as well as the economic, psychological, and sociological aspects of security and privacy. Professor Schneier studies user behavior and human factors related to security and privacy, and his 2014 book Data and Goliath explores people's relationship with privacy and their behaviors regarding privacy. Professor Schneier will testify about the matters detailed in his expert reports and discussed during his deposition, including in terms of provide context for the existence of reasonable expectations of privacy in connection with app activity information and why Google's collection, storage, and use of that information is highly offensive.	Live / Will Call

II. GOOGLE'S WITNESS LIST

Google's Fact Witnesses	
Witness Name	Statement of the Substance of Testimony
Steve Ganem	Mr. Ganem will offer testimony about the functionality of Google Analytics for Firebase; the collection and use of data by Google Analytics for Firebase; the benefits Google Analytics for Firebase provides to the users of apps; the integration of Google Analytics with Firebase and the Terms of Service and Use Policy relating to Google Analytics for Firebase throughout the Class Period.
David Monsees	Mr. Monsees will offer testimony about the collection and use of data by Web & App Activity ("WAA"); Google's disclosures to users relating to WAA, including in the Google Account Setup flow; and Google's Privacy Policies throughout the Class Period, including as they relate to WAA.
Belinda Langner	Ms. Langner will offer testimony about Google's use of app-activity data collected through Google Analytics for Firebase for purposes of targeting advertisements and deriving revenue through advertising.
Christopher Ruemmler	Mr. Ruemmler will offer testimony about the context of the concerns he expressed about the WAA setting.
Google's Expert Witnesses	
John Black	Dr. Black will offer testimony consistent with his rebuttal opinions on Google's technology and its collection, use, and storage of sWAA-off data consistent with his opinions in his May 31, 2023 report.
Donna Hoffman	Dr. Hoffman will offer testimony consistent with her rebuttal opinions on online consumer behavior in technology environments, including the consumer response to user interface design, and the concept of "Dark Patterns" as outlined in her May 31, 2023 and March 24, 2025 expert reports served in this matter.
Anindya Ghose	Dr. Ghose will offer testimony consistent with his opinions on Mr. Lasinski's analysis of "actual damages" in this litigation, as outlined in his May 31, 2023 expert report.
Christopher Knittel	Dr. Knittel will offer testimony consistent with his rebuttal opinions on Mr. Lasinski's methodologies for calculating class-wide damages, including disgorgement of profit and "actual" damages, as outlined in his May 31, 2023 expert report.

SIGNATURE BLOCKS

Dated: June 24, 2025

Dated: June 24, 2025

BOIES SCHILLER FLEXNER LLP**COOLEY LLP**By: /s/ Mark C. MaoBy: /s/ Benedict Y. HurDavid Boies (admitted *pro hac vice*)

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ATTESTATION

I, Mark Mao, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: June 24, 2025

By: /s/ Mark Mao